

The Law Office of Daniel A. Brown
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Atlanta, GA 30354
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F: 404-253-1531
E: Info@DanielABrownLaw.com

**IN THE STATE COURT OF DEKALB
COUNTY STATE OF GEORGIA**

CHARLES TURNER,)	
Plaintiff,)	CIVIL ACTION FILE NO.
)	
v.)	
)	
QUIKTRIP CORPORATION,)	JURY TRIAL DEMANDED
Defendant.)	

CERTIFICATE OF SERVICE

COMES NOW the undersigned Attorney, Daniel A. Brown and hereby certifies that I have served the Defendant to this case with a copy of the Notice of Leave of Absence via the Electronic filing system and Process Server at the following:

QUIKTRIP CORPORATION
Defendant
C/O REGISTERED AGENT: CT CORPORATION SYSTEM
289 S Culver Street
Lawrenceville, GA 30046

This 5TH day of January, 2023.

/s/ Daniel A. Brown
Daniel A. Brown, Esq.
Attorney for Plaintiff
Georgia State Bar #272490

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General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of DEKALB County

For Clerk Use Only

Date Filed 1/5/2023
MM-DD-YYYY

23A00049

Case Number _____

Plaintiff(s)

TURNER, CHARLES

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney DANIEL A. BROWN, ESQ.

Defendant(s)

QUIKTRIP CORPORATION

Last First Middle I. Suffix Prefix

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Bar Number 272490 Self-Represented ☐

Check One Case Type in One Box

General Civil Cases

- ☐ Automobile Tort
☐ Civil Appeal
☐ Contract
☐ Garnishment
☒ General Tort
☐ Habeas Corpus
☐ Injunction/Mandamus/Other Writ
☐ Landlord/Tenant
☐ Medical Malpractice Tort
☐ Product Liability Tort
☐ Real Property
☐ Restraining Petition
☐ Other General Civil

Domestic Relations Cases

- ☐ Adoption
☐ Dissolution/Divorce/Separate Maintenance
☐ Family Violence Petition
☐ Paternity/Legitimation
☐ Support – IV-D
☐ Support – Private (non-IV-D)
☐ Other Domestic Relations

Post-Judgment – Check One Case Type

- ☐ Contempt
☐ Non-payment of child support, medical support, or alimony
☐ Modification
☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number _____

Case Number _____

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. _____
 Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

Version 1.1.18

STATE COURT OF
 DEKALB COUNTY, GA.
 1/5/2023 10:08 AM
 E-FILED
 BY: Monica Gay

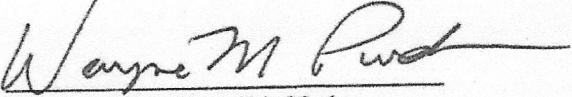
IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

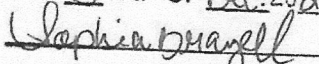
RE: Permanent Process Servers

STANDING ORDER

Pursuant to O.C.G.A. § 9-11-4 (c), this Court provides herein that any person who has completed the application process for appointment as a permanent process server in the Superior Court of DeKalb County in 2023, and has been appointed as a permanent process server in said Court for 2023 shall be deemed to be appointed as a permanent process server in the State Court of DeKalb County. Permanent process servers wishing to rely upon this order shall be required to attach a copy of their Superior Court order of appointment to any affidavit of service that is required to be filed with the Court. All appointments arising pursuant to this order shall be effective until midnight, December 31, 2023.

SO ORDERED, this 13 day of December 2022.


Wayne M. Purdom, Chief Judge

FILED IN THIS OFFICE
THIS 13 DAY OF Dec. 2022

Clerk, State Court, DeKalb County

AFFIDAVIT OF SERVICE

State of Georgia

County of ^{Dekalb} ~~Dekalb~~

State Court

Case Number: 23A00049

Plaintiff:

CHARLES TURNER

vs.

Defendant:

QUIKTRIP CORPORATION

For:

The Law Office Of Daniel A. Brown, LLC
1001 Virginia Avenue
Suite 350
Atlanta, GA 30354

Received by Freshvisions Legal Service, LLC on the 6th day of January, 2023 at 9:59 am to be served on **Quiktrip Corporation C/O CT Corporation, Registered Agent, 289 S. Culver St., Lawrenceville, Gwinnett County, GA 30046.**

I, Milton Nolen, being duly sworn, depose and say that on the **9th day of January, 2023 at 10:25 am, I:**

served **REGISTERED AGENT, CT Corporation**, a true copy of the **SUMMONS, COMPLAINT, VERIFICATION, NOTICE OF LEAVE OF ABSENCE W/CERTIFICATE OF SERVICE, CASE FILING INFORMATION FORM**, to Jane Richardson, an authorized representative for the registered agent, at the address of: **289 S. Culver St., Lawrenceville, Gwinnett County, GA 30046** on behalf of Quiktrip Corporation and informed said person of the contents therein, in compliance with state statutes.

I certify that I am over the age of 18, have no interest in the above action, and I am a Georgia certified process server in good standing.

Subscribed and Sworn to before me on the 9th day of January, 2023 by the affiant who is personally known to me.

NOTARY PUBLIC

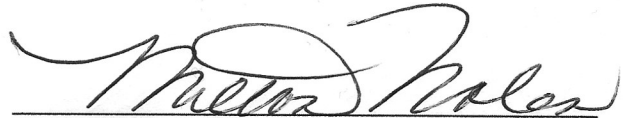
JULIE HEFFERNAN

NOTARY PUBLIC

Cobb County

State of Georgia

My Comm. Expires Nov. 14, 2026



Milton Nolen

Ga. Certified Process Server

Freshvisions Legal Service, LLC

P.O. Box 2706

Acworth, GA 30102-9998

(470) 423-9886

Our Job Serial Number: FVL-2023000020

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

CHARLES TURNER,

Plaintiff,

v.

QUIKTRIP CORPORATION,

Defendant.

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CIVIL ACTION

FILE NO. 23A00049

DEMAND FOR TWELVE MEMBER JURY TRIAL

COMES NOW, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, and demands a trial by a twelve member jury in the above styled action.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
Sean L. Hynes
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
T: 770-422-3233
F: 770-423-4199

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Daniel A. Brown, Esq.
The Law Office of Daniel A. Brown
1001 Virginia Avenue, Suite 350
Atlanta, Georgia 30354

This 8th day of February, 2023.

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
Sean L. Hynes
Georgia State Bar No. 381698

STATE COURT OF
DEKALB COUNTY, GA.
2/8/2023 11:07 AM
E-FILED
BY: Patricia Harris

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

CHARLES TURNER,

Plaintiff,

v.

QUIKTRIP CORPORATION,

Defendant.

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CIVIL ACTION

FILE NO. 23A00049

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

Pursuant to Uniform State Court Rule 5.2, the undersigned hereby certifies that on the date shown, Defendant QUIKTRIP CORPORATION, appearing specially and without submitting to the jurisdiction and venue of this Court, served copies of the following pleadings:

1. Defendant's First Continuing Interrogatories to Plaintiff;
2. Defendant's First Request for Production of Documents to Plaintiff; and
3. Defendant's First Request for Admissions to Plaintiff;

by depositing same in the United States Mail, properly addressed and with sufficient postage affixed thereon, to the following counsel of record:

Daniel A. Brown, Esq.
The Law Office of Daniel A. Brown
1001 Virginia Avenue, Suite 350
Atlanta, Georgia 30354

This 8th day of February, 2023.

Respectfully submitted,

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
Sean L. Hynes
Georgia State Bar No. 381698
hynes@downeycleveland.com
Attorneys for Defendant

Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060-1979
T: 770-422-3233
F: 770-423-4199

STATE COURT OF
DEKALB COUNTY, GA.
2/8/2023 11:07 AM
E-FILED
BY: Patricia Harris

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following counsel of record with a true and correct copy of the foregoing pleading via electronic service and/or by depositing said copy in the United States Mail, with sufficient postage affixed thereon, and properly addressed to the following:

Daniel A. Brown, Esq.
The Law Office of Daniel A. Brown
1001 Virginia Avenue, Suite 350
Atlanta, Georgia 30354

This 8th day of February, 2023.

DOWNEY & CLEVELAND, LLP

By: /s/ Sean L. Hynes
Sean L. Hynes
Georgia State Bar No. 381698

STATE COURT OF
DEKALB COUNTY, GA.
2/8/2023 11:07 AM
E-FILED
BY: Patricia Harris

**IN THE STATE COURT OF DEKALB
COUNTY STATE OF GEORGIA**

CHARLES TURNER,
Plaintiff,

v.

QUIKTRIP CORPORATION,
Defendant.

)
) **CIVIL ACTION FILE NO.**
) 23A00049
)
)
)

RULE 5.2 CERTIFICATE OF SERVICE

COMES NOW the undersigned Attorney Daniel A. Brown and I hereby certify that I have served the Defendant with:

1. *Plaintiff's First Interrogatories to Defendant*
2. *Plaintiff's First Request for Production of Documents and Notice to Produce to Defendant*
3. *Plaintiff's First Request for Admissions to Defendant*

via the Electronic filing system, US first class certified mail, and email:

QUIKTRIP CORPORATION
c/o Sean L. Hynes, Esq.
Attorney for Defendant
Downey & Cleveland, LLP
288 Washington Avenue
Marietta, GA 30060
hynes@downeycleveland.com

This 9th day of February, 2023.

/s/ Daniel A. Brown
Daniel A. Brown, Esq.
Attorney for Plaintiff
Georgia State Bar #272490

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